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DATE: 28/03/2025

TEL: (061) 290 2485
REF: Farm Oamites No 53

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RE: REVIEW LETTER FOR THE ENVIRONMENTAL IMPACT SCOPING REPORT AND ENVIRONMENTAL MANAGEMENT PLAN FOR THE CREATION OF PUBLIC ROAD AND SUBDIVISION OF THE REMAINDER OF FARM OAMITES NO. 53 INTO 86 PORTIONS AND REMAINDER IN WINDHOEK, KHOMAS REGION.

The Environmental Impact Assessment (EIA) and Environmental Management Plan (EMP) Report on the above captioned subject matter received in November 2025 has reference.

This EIA and EMP has been reviewed with the basic understanding that it is a subdivision which triggers Section 5.2 Establishment of land resettlement Schemes, and one Infrastructure which is the Road which triggers Section 10.1 and 10.2.

It was assumed that the information provided is true and accurate and the Windhoek Municipal Council will not be held responsible for erroneous review outcome. This EIA & EMP addresses the construction of the road and construction camp but is not suitable for a sand mining or burrow pits.

The comments are presented below:

1. LEGISLATION

1.1. Listed Activities

Subdivision comes with associated bulk activities for establishment of Town Planning activities and land use activities for which the subdivision is made.

These bulk infrastructure for subdivision triggers Sections relevant to Listed Activities in the Regulation for Listed Activities which are Electricity, Waste Reticulation (Reservoirs, Pump stations and Boreholes (Section 8 and 10.1), Wastewater Treatment Plant (Section 8.6), Removal of vegetation (Section 4) use of chemical (Section 9). The fate of their assessment including the mentioned land use activities should already be indicated in this Section.

It is noted that only one bulk service for roads which triggers assessment is mentioned for which the EIA is made. This include construction camp, but excludes sand mining and or burrow pits while the other bulk infrastructures are rather described and not assessed in the report.

2. BULK SERVICE AND INFRASTRUCTURE PROVISION

2.1. Waste

On Pg. 28 it is recommended that a Waste Management Plan form part of this EIA. This plan is not attached to this Report, neither is it mentioned when it will be submitted.

2.2. Water Supply

It is not clear if this Report by SLR 2023, includes the water supply situation of the additional 84 portions to be subdivided. This needs to be confirmed either by attaching the Report or by Geo-hydrological Section at Infrastructure, Bulk Water and Wastewater at the City of Windhoek.

3. NATURAL ENVIRONMENT

The Report indicate that the proposed Agriculture activities will have a minimum to small impacts. However, the nature, type and features of the ground water are not described. Features of the aquifer that include potential recharge areas, types of aquifer, faults, water table are not given.

In addition, the sustainability of the ground water resource is not assured, seeing the expected water demand. Thus, it is requested that this Report be reviewed by the Department of Water Affairs at the Ministry of Agriculture, Water and Forestry, including Namwater.

4. IMPACT ASSESSMENT AND EVALUATION

The impact assessment under 10.1 for the construction and operation looks only at the construction of the road and sewer system. All other land use activities are excluded, while the EIA Report indicates that there won't be a sewerage system. Thus relevant activities for which this EIA is done should be included.

5. CUMULATIVE IMPACTS

Furthermore, the cumulative impact assessment on the site should also be improved since there will be 86 sites with intensive farming which are potential point sources and diffuse sources of pollution.

6. PUBLIC PARTICIPATION

The Public Participation parts is mentioned under both section 3 (Page. 16, Needs and Desirability and Motivation) Section 6 (Page 38 Approach to Study). A section on Annexure of Public Participation is missing in the Report.

7. REFERENCING

The Report makes reference to discussions with CoW officials (Engineers), but no minutes are attached to support the facts given. Furthermore, in some instances it does not indicate the Sections or Division of these Officials.

Secondly, most of the Geology, Soil and Hydrological component refers to Grunert, 2003 and the Assessment and Investigation by SLR Environmental Consulting Namibia Ltd, February 2022. But this documents are not listed under Reference Section.

8. ENVIRONMENTAL MANAGEMENT PLAN

The EMP proposes mitigation measures such as French /Septic tank under 4.2.6.(f)(pg.18 and 4.3.1 (a) and pollution control ponds (4.2.1) (h), dumping pits 4.2.18 (k) etc., that contradicts the principles obtained from Department of Infrastructure Water and Technical Services of CoW which are listed on pg.27 of the EIA Report. Furthermore, these measures pose a threat to ground water resources and triggers the list of Listed Activities that may not be undertaken without an ECC.

Clear reference of the documents that contains mitigation measures that are not mentioned in this EMP should be properly referenced and listed. This documents should be listed under reference section.

The proposed mitigation measures for Decommissioning are not befitting its purpose. Thus, this part of EMP should be reviewed and improved accordingly.

9. TOWN PLANNING COMMENTS

The comments from Town Planning are attached as Annexure 1.

10. RECOMMEDATION

It is recommended that:

10.1. Legislation

- The section for Legislation clearly indicate which Listed Activities are the responsibility of the proponent and which ones are the responsibility of the future land owners.
- This section indicate the fate of EIA's for other Infrastructure and Land use activities that are not assessed in this Report, seeing that it's intensive Agricultural Activities including Industries (Processing and Packaging).

10.2 Bulk Services and Infrastructure Provision

- The Waste Management Plan be attached to this EIA and if not, it should be mentioned when it will be done.
- That the Report by SLR 2023 be submitted to Geo-hydrology Section of the CoW.

10.3. Natural Environment

- That the Geo-hydrological section be expanded to include features of the aquifer as described above.
- That information regarding sustainability of ground water resource be included in this EIA and this should also be submitted to the Geo-hydrological Section within the CoW for review.
- That this EIA Report be submitted to the Department of Water Affairs at the Ministry of Forestry and Namwater for review.

10.4. Impact Assessment and Evaluation

- The Impact Assessment should clearly and completely assess all impacts resulting from the listed activities for which this EIA is made.

10.5. Cumulative Impacts

- The cumulative impacts should speak to all point sources and diffuse sources of pollution considering that it propose intensive Agricultural land use activities.

10.6. Public Participation

- That a complete Public Participation Report be included in the report.

10.7. Referencing

- That the minutes of consultations done with CoW officials be attached to this Report.
- That all documents used in this Report be listed in the Reference Section.

10.8. Environment Management Plan

- That mitigation measures that pose a threat to ground water resource be avoided.
- That mitigation measures aim at protecting the environment especially natural resources and should be clear for the purpose of implementation and auditing.

- That it be noted that mitigation measures that pose a threat to ground water are listed under listed activities that may not be undertaken without an EIA, and should thus be exposed to Environmental Assessment.
- That documents that contain mitigation measures referred in this Section, be properly cited and listed under the Referencing Section.
- That Section on Decommissioning be reviewed to befit its purpose.

11. CONCLUSION

This EIA for Oamites No 53 addresses some listed activities as per EMA 7 of 2007, while excluding other listed activities associated with the development. It makes it suitable for the gravel road construction and construction camp only.

Clear responsibility of environment assessment for the listed activities for List of Listed Activities that may not be undertaken without ECC by the proponent and by the future land use owners needs to be clarified.

The support of this zoning will depend on the Geohydrology Section at Department of Infrastructure.

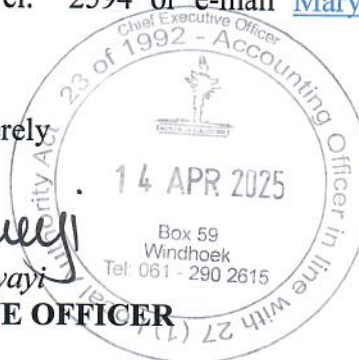
The excluded activities are listed activities as per EMA 7 of 2007 and should be exposed to an EIA before any construction.

For more information or any clarification, please contact Mrs. Mary-Anne Kahitu Hjarunguru, Manager: Health & Environment Services at Tel. 2594 or e-mail [Mary-Anne Kahitu. @windhoekcc.org.na](mailto:Mary-Anne.Kahitu@windhoekcc.org.na)

Yours sincerely,


Moses Matyayi

CHIEF EXECUTIVE OFFICER



ANNEXURE 1. COMMENTS BY DEPARTMENT OF URBAN TRANSPORT PLANNING

RE: REVIEW LETTER FOR THE ENVIRONMENT IMPACT SCOPING REPORT AND ENVIRONMENTAL MANAGEMENT PLAN FOR THE CREATION OF PUBLIC ROAD AND SUBDIVISION OF THE REMAINDER OF FARM OAMITES NO. 53 INTO 86 PORTIONS AND REMAINDER IN WINDHOEK, KHOMAS REGION.

The Comments from the Department of Urban Transport Planning on the above caption matter are as follows:

1. Strategic Executive: Urban Transport Planning

1.1 Urban Policy

- (a) Applicant to note that the title deed conditions need to be altered to accommodate the proposed development and land uses in line with the Urban and Regional Planning Act, Act 5 of 2018.
- (b) It should be noted that no ECC for Portions 14 to 33 was submitted – therefore, the EIA should assess the cumulative impacts of the existing plots, in addition to the proposed 86 plots.
- (c) Impacts of the railway and road traffic noise on the proposed properties (especially the properties abutting the railway reserve) not adequately assessed and the associated mitigation measures not sufficiently provided.
- (d) Applicant to address the provision of all municipal services, in particular water security subject to written approval by the relevant service departments.

1.2 Sustainable Development

- (a) No objections to the proposed development on condition that the applicant addresses all municipal service requirements, in particular the water security concerns subject to written approval by the relevant service departments.

1.3 Road Planning, Design & Traffic Flow

- (a) The 4 access points required from either the B1 National Road or District Road 1320 to Groot Aub should be as per approval by the Roads Authority's letter dated 10 August 2023.
- (b) The letter from the Roads Authority does not mention the existing north-western access from the B1, as indication is this access might need to be closed should the B1 be upgraded into a freeway. The Town Planner should verify that alternative access is catered for in such instance.

- (c) Proposed Access to Farm Oamites (Access 1 & 2), approximately 300m from the B1, should be as per approval by the Roads Authority's letter dated 02 May 2024 and the /Khomein Clan Traditional Authority's letter dated 01 December 2024.
- (d) All level crossings over the railway line should be as per Trans Namib's approval letter dated 28 February 2024.
- (e) All RoW servitudes must be registered in favour of the general public.
- (f) A 100 m building restriction should be registered against all properties adjacent to the B1 road, measured from the centre line of the B1.
- (g) No further access is supported from the B1, other than authorised by the RA.
- (h) A development agreement must be signed whereby an Engineer or Engineering firm is appointed to design and supervise construction of all municipal infrastructure. All erven must be fully serviced before they are transferred over to a third party in title.
- (i) Since the Council has no capacity presently to take over the roads located outside the serviced perimeter, and owner's association must be established for maintenance and upgrading of internal streets.